



April 2, 2004

LOCATIONS

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(419) 732-7563

Ms. Jennifer J. Johnson
Board of Governors
Federal Reserve System
20th & Constitution Avenue, NW
Washington DC 20551

RE: Docket No. R-1181

Dear Ms. Johnson:

I am writing this letter in **support** of the regulations proposed to update the Community Reinvestment Act (CRA). Specifically, this community bank supports the proposal to increase the asset threshold of banks that would qualify as small community institutions from \$250 million to \$500 million. Additionally, we **support** the proposal of eliminating the separate holding company qualification for the streamlined examination (currently \$1 billion).

Regulations have changed over the years, however, the business of community banks has not. The investment and service tests today are not as relevant to a community bank as they are to larger institutions.

Should the regulation proposals pass, this institution would still be required to comply with the general requirements of CRA for small banks – capturing the information necessary for examiners to assess whether a community bank is meeting the credit needs of its communities.

Very truly yours,

THE CROGHAN COLONIAL BANK

Steven C. Eutrell
President & CEO

SCF/aal